

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

1.	KENNEY PHILLIPS,)	
)	
	Plaintiff,)	
)	
vs.)	Case No. 18-cv-00031-GKF-JFJ
)	
2.	FARMERS INSURANCE)	
	COMPANY, INC.,)	
)	
	Defendant.)	

NOTICE OF REMOVAL BY
DEFENDANT FARMERS INSURANCE COMPANY, INC.

The Defendant, Farmers Insurance Company, Inc. (“FICO”), hereby notifies the Court of the removal of the captioned action, and, in support of its removal in this case, states as follows:

General Allegations

1. The above-entitled cause was commenced in the District Court of Tulsa County, State of Oklahoma, on December 11, 2017, and is pending in that Court. (Petition and Summons, attached hereto as Exhibit “1”). FICO filed an Entry of Appearance on January 8, 2017. (Entry of Appearance as Exhibit “2”).

2. This is a civil action in which the Plaintiff, Kenney Phillips, alleges that FICO owes him underinsured motorist insurance benefits as a result of an auto accident on June 10, 2015. In his prayer for relief, Mr. Phillips seeks judgment against FICO for \$1,000,000.00 (Exhibit “1”).

Diversity Jurisdiction

3. This Court has original jurisdiction over this action by reason of the diversity of citizenship of the parties, pursuant to 23 U.S.C.A. § 1332.

4. Complete diversity of citizenship exists in this case. The Plaintiff is a resident of Tulsa County. FICO is a foreign insurance company that is incorporated in the State of Kansas with its principal place of business in California.

5. The amount in controversy in this case, exclusive of interest and costs, exceeds Seventy Five Thousand Dollars and 00/100 (\$75,000.00). Mr. Phillips has demanded that FICO pay him UM benefits in the amount of \$1,000,000.00. (Petition, Ex. "1"). The amount in controversy requirement is satisfied in this case.

Removal Jurisdiction

6. This Court has removal jurisdiction over this case pursuant to 28 U.S.C. § 1441, et. seq., and all procedural requirements for removal are satisfied.

7. FICO is removing this case to this Court within one year of the commencement of this action, and within thirty (30) days of its receipt of the Plaintiff's lawsuit.

8. Copies of all pleadings served on FICO are attached hereto as Exhibit "1".

WHEREFORE, Defendant Farmers Insurance Company, Inc. gives notice that the above-entitled action is hereby removed from the District Court of Tulsa County, State of Oklahoma to the United States District Court for the Northern District of Oklahoma.

Respectfully submitted,

TAYLOR, RYAN, MINTON & VAN
DALSEM, P.C.

s/Ashley M. Bibb

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CERTIFICATE OF SERVICE

I, ASHLEY M. BIBB, hereby certify that on the 12th day of January, 2018, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Anthony M. Laizure
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s/Ashley M. Bibb
ASHLEY M. BIBB